



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

March 17, 2021

**VIA ECF**

The Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
United States Courthouse, 500 Pearl Street  
New York, New York 10007

**Re: *United States v. Dupont*, 19 Cr. 444 (RMB)**

Dear Judge Berman:

On August 4, 2020, the Court set a trial date for the above-captioned case of February 16, 2021. On November 30, 2020, upon the defendant's application and with the Government's consent, due to the circumstances of the pandemic, the Court adjourned the trial to June 28, 2021, and excluded time pursuant to the Speedy Trial Act until that date. (Dkt. 37.) The Court also adjourned a pretrial conference, previously scheduled for February 8, 2021, to May 5, 2021. (Dkt. 39.)

Prior to the adjournment of the trial date, the Court had set motion deadlines beginning approximately three months prior to the trial date. *See* Minute Entry dated August 4, 2020. Accordingly, and because no motion deadlines were set when the Court adjourned the trial date, the Government writes respectfully to request that the Court set a motion schedule.

The Government has conferred with defense counsel, and the parties jointly propose the following schedule: defense motions by Friday, April 16, 2021; government response by April 30, 2021; and any defense reply by May 7, 2021. This would complete pretrial motion briefing nearly two months before trial is set to begin.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By: \_\_\_\_\_

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Cc: Zawadi Baharanyi, *counsel to defendant* (via ECF)